

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

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CAROLYN DYKES, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

GATESTONE & CO. INTERNATIONAL INC,

Defendant.

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Civil Action No.  
1:18-cv-00154 (LO/MSN)

Declaration of Plaintiff's Attorney Thomas R. Breeden in  
Support of Motion for Class Certification and Appointment as Class Counsel

Under 28 U.S.C. § 1746, I, Thomas R. Breeden, do hereby declare under  
penalty of perjury, that the following is true and correct:

1. I am a principal of the Thomas R. Breeden, P.C.
2. I am submitting this Declaration in support of Plaintiff Carolyn Dykes  
motion for class certification and request for appointment of class counsel.
3. My credentials to serve as class counsel are as follows:
4. I graduated from Cornell University with a B.A. in Mathematics and  
History in 1988.
5. I earned my J.D. from Washington and Lee School of Law in 1991.
6. I am a member in good standing of the bar of the Commonwealth of  
Virginia.
7. I am a member in good standing of the following federal courts:

U.S. District Court for the Eastern District of Virginia

U.S. District Court for the Western District of Virginia

United States Court of Appeals for the Fourth Circuit

#### Background and Qualifications

8. From 1991 until 1993, I was employed by the law office of Vanderpool, Frostick and Massey in Manassas, Virginia.

9. In August 1993, I started my own practice, Thomas R. Breeden, P.C., with a significant concentration in the field of consumer protection law.

10. I have experience in the fields of commercial litigation, bankruptcy, real estate, landlord/tenant law, consumer protection, domestic, personal injury, business litigation, and criminal law.

11. I now focus a large segment of my practice on representation of consumers in consumer rights litigation and class actions.

12. I am experienced in trial and appellate court litigation and have the following reported cases, among others:

Biber v. Pioneer Credit Recovery, Inc., 2018 WL 1633693 (E.D. Va. 2018)

Biber v. Pioneer Credit Recovery, Inc, 229 F. Supp.3d 457 (E.D. Va. 2017)

Dashiell v. Van Ru Credit Corp., 283 F.R.D. 319 (E.D.Virginia 2012)

Milbourne v JRK Residential America, LLC, 92 F.Supp.3d 4235 (E.D. Virginia 2015)

Milbourne v JRK Residential America, LLC, 2014 WL 1369378 (E.D. Virginia 2014)

Milbourne v JRK Residential America, LLC, 2014 WL 5529731 (E.D. Virginia 2014)

Dykes v Portfolio Recovery Service, LLC, 2015 WL 3965885 (E.D. Virginia 2015)

Tobey v. National Action Financial Services, Inc., 2009 WL 3734320 (E.D.N.Y. Nov. 4, 2009)

Moreno v DHI Mortgage Co. GP., Inc., 2010 WL 3430816 (ED Va 2010)

Robert M. Seh Co., Inc. v O'Donnell, 675 SE 2d 202 (Va 2009)

Com State Lottery Dept v Settlement Funding, LLC, 2008 WL 6759945 (Va Cir Ct 2008)

Korpsak v Korpsak, 2008 WL 2242087 (Va App 2008)

Settlement Funding LLC v Von Neumann-Lillie, 645 SE2d 436 (Va 2007)

Manassas AutoCars v Couch, 645 SE2d 443 (Va 2007)

Brandt v Maha Lakshmi Motors, Inc, 632 SE2d 628 (Va App 2006)

Glumina Bank v DC Diamond Corp, 527 SE2d 775 (Va 2000).

13. I am also experienced in consumer fraud class action litigation and have participated in the following filed cases, among others:

- Biber v. Pioneer Credit Recovery, Inc., 2018 WL 1633693 (E.D. Va. 2018)
- Biber v. Pioneer Credit Recovery, Inc, 229 F. Supp.3d 457 (E.D. Va. 2017)
- Dashiell v. Van Ru Credit Corp., 283 F.R.D. 319 (E.D.Virginia 2012)
- Stinson v Delta Management Associates, Inc. US District Court of the Southern District of Ohio, Case No. 1:13cv238
- Milbourne v JRK Residential America, US District Court for the Eastern District of Virginia, Richmond Division, Case No: 3:12CV861
- Jasper v Account Control Technology, Inc., US District Court for the Eastern District of Virginia, Richmond Division, Case No. 3:13CV296

14. I have had direct involvement with the named plaintiff, who has been actively involved in the management of the litigation and he has no known conflicts with any of the class members.

15. I know of no other class members who have brought similar claims against Defendant, and to my knowledge none have been filed with this Court.

16. I have no ownership interest in Defendant and have no interest that might cause me not to vigorously pursue this action.

17. Under 28 U.S.C. § 1746, I, Thomas R. Breeden, do hereby certify under penalties of perjury, that the above statements are true and correct to the extent they reflect my personal knowledge and otherwise are based upon my information and belief.

Dated: Manassas, Virginia  
October 5, 2018

/s/ Thomas R. Breeden  
Thomas R. Breeden